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*Attorneys for Defendants Rimini Street, Inc. and Seth Ravin*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ORACLE USA, INC., a Colorado corporation;  
ORACLE AMERICA, INC., a Delaware  
corporation; and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation,  
and SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DECLARATION OF ROBERT H.  
RECKERS IN SUPPORT OF  
DEFENDANTS RIMINI STREET, INC.'S  
AND SETH RAVIN'S OPPOSITION TO  
ORACLE'S MOTION FOR ATTORNEYS'  
FEES AND COSTS**

Judge: Hon. Larry R. Hicks

1 I, Robert H. Reckers, have personal knowledge of the facts stated below and, under penalty of  
2 perjury hereby declare:

3 1. I am an attorney admitted to practice *pro hac vice* before this Court in the above-  
4 captioned matter, and I am an attorney at Shook, Hardy and Bacon LLP, attorneys for Defendants  
5 Rimini Street, Inc. and Seth Ravin (together, "Defendants"). I make this declaration in support of  
6 Defendants' Opposition to Oracle's Motion for Attorneys' Fees and Costs.

7 2. Attached as **Exhibit A** is a true and correct copy of Plaintiffs' modified demonstrative  
8 6006, presented during Plaintiffs' closing argument on October 6, 2015.

9 3. Attached as **Exhibit B** is a true and correct copy of a document Oracle produced on  
10 February 5, 2016, Bates stamped ORCLFEEPROD00001-00014, reflecting Oracle's billing  
11 guidelines and engagement letters with the law firms Bingham McCutchen, LLP and Boies, Schiller  
12 & Flexner LLP.

13 4. Attached as **Exhibit C** is a true and correct copy of a letter from Scott Gattey of Siebel  
14 Systems, Inc. to Seth Ravin of Rimini Street dated September 26, 2005.

15 5. Attached as **Exhibit D** is a true and correct copy of a letter from Patrick Byrne of  
16 Snell & Wilmer to Scott Gattey and Alexa King of Siebel Systems, Inc. dated October 6, 2005.

17 6. Attached as **Exhibit E** is a true and correct copy of a letter from Robert Freitas of  
18 Orrick, Herrington & Sutcliffe to Jeffrey Barr of Snell & Wilmer dated November 16, 2005.

19 7. Attached as **Exhibit F** is a true and correct copy of a letter from Jeffrey Barr of Snell  
20 & Wilmer to Scott Gattey of Oracle dated June 5, 2006.

21 8. Attached as **Exhibit G** is a true and correct copy of a letter from Wendy Neal of Snell  
22 & Wilmer to Scott Gattey of Oracle dated June 28, 2007.

23 9. Attached as **Exhibit H** is a true and correct copy of a letter from Dan Goldfine of  
24 Snell & Wilmer to Jeffrey Ross of Oracle USA, Inc. dated December 3, 2008.

25 10. Attached as **Exhibit I** is a true and correct copy of excerpts from the deposition of  
26 Elizabeth Lester taken on March 17, 2011.

27 11. Attached as **Exhibit J** is a true and correct copy of excerpts from the deposition of  
28 Krista Williams taken on October 5, 2011.

1           12.     On October 15, 2014, Defendants served Plaintiffs with an offer of judgment pursuant  
2 to Federal Rule of Civil Procedure 68 for [REDACTED]  
3 [REDACTED] Oracle rejected the offer.

4           13.     On July 27, 2015, Defendants served Plaintiffs with an offer of judgment pursuant to  
5 Federal Rule of Civil Procedure 68 for [REDACTED]  
6 [REDACTED] Oracle rejected the offer on July 28, 2015. Attached  
7 as **Exhibits K & L** are true and correct copies of Rimini's Rule 68 offer of judgment and Oracle's  
8 letter rejecting the offer.

9           14.     On August 24, 2015, Defendants served Plaintiffs with an offer of judgment pursuant  
10 to Federal Rule of Civil Procedure 68 for [REDACTED]  
11 [REDACTED] Oracle rejected the offer on August 25, 2015.  
12 Attached as **Exhibits M & N** are true and correct copies of Rimini's Rule 68 offer of judgment and  
13 Oracle's letter rejecting the offer.

14  
15 Executed on March 8, 2016.

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17 By: /s/ Robert H. Reckers  
18 Robert H. Reckers  
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